

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
PROMISE HEALTHCARE GROUP, LLC, <i>et al.</i> ,	Case No. 18-12491 (CTG)
Debtors.	(Jointly Administered)
ROBERT MICHAELSON OF ADVISORY TRUST GROUP, LLC, IN HIS CAPACITY AS LIQUIDATING TRUSTEE,	
Plaintiff/Counter-Defendant.	
v.	Adv. Proc. No. 19-50776 (CTG)
KPC PROMISE HEALTHCARE, LLC and STRATEGIC GLOBAL MANAGEMENT, INC.,	
Defendants/Counter-Claimants.	

STIPULATION OF DISMISSAL OF ADVERSARY PROCEEDING

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, made applicable to the above-captioned adversary proceeding (the “Adversary Proceeding”) pursuant to Rule 7041 of the Federal Rules of Bankruptcy Procedure, Robert Michaelson of Advisory Trust Group, LLC, in his capacity as Liquidating Trustee and plaintiff/counter-defendant, on the one hand, and KPC Promise Healthcare, LLC and Strategic Global Management, Inc. as defendants/counter-claimants, on the other hand, hereby stipulate and agree to the dismissal, with prejudice, of the Adversary Proceeding in its entirety, with all fees and costs to be borne by the party that incurred them.

Dated: October 7, 2021

DLA PIPER LLP (US)

/s/ Stuart M. Brown

Stuart M. Brown (No. 4050)
Matthew S. Sarna (No. 6578)
1201 N. Market Street, Suite 2100
Wilmington, DE 19801
Telephone: (302) 468-5700
Facsimile: (302) 394-2341
Email: Stuart.Brown@dlapiper.com
Matthew.Sarna@dlapiper.com

-and-

WALLER LANSDEN DORTCH &
DAVIS, LLP

John Tishler (admitted pro hac vice)
Katie G. Stenberg (admitted pro hac vice)
Blake D. Roth (admitted pro hac vice)
Tyler N. Layne (admitted pro hac vice)
Jeremy A. Oliver (admitted pro hac vice)
511 Union Street, Suite 2700
Nashville, TN 37219
Telephone: (615) 244-6380
Facsimile: (615) 244-6804
Email: John.Tishler@wallerlaw.com
Katie.Stenberg@wallerlaw.com
Blake.Roth@wallerlaw.com
Tyler.Layne@wallerlaw.com
Jeremy.Oliver@wallerlaw.com

Attorneys for Plaintiff/Counter-Defendant

BARNES & THORNBURG LLP

/s/ Kevin G. Collins

Thomas E. Hanson, Jr. (No. 4102)
Kevin G. Collins (No. 5149)
1000 N. West Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 300-3434
Facsimile: (302) 300-3456
Email: thanson@btlaw.com
kcollins@btlaw.com

-and-

BUCHALTER, A Professional Corporation
Mary H. Rose (admitted pro hac vice)
1000 Wilshire Boulevard, Suite 1500
Los Angeles, California 90017
Telephone: (213) 891-0700
Facsimile: (213) 896-0400
Email: mrose@buchalter.com

Attorneys for Defendants/Counter-Claimants